

August 20, 2003

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Subject: Draft 1 Specification for Energy Star®, Refrigerated Beverage Vending Machines

Dear Rebecca,

Thank you for the opportunity to comment on the *Draft 1* Energy Star® proposal for Refrigerated Beverage Vending Machines distributed by the EPA on July 31, 2003.

Dixie-Narco is committed to providing products that deliver substantial improvement in energy consumption relative to both our legacy Refrigerated Beverage Vending Machines and other machines in the marketplace in a timely and efficient manner. With that in mind, our team has reviewed the proposal and would like to provide the following comments and recommendations relative to the draft.

- With reference to Section 4.A., on page 7, since Glass Front Machines may now qualify as Energy Star® and because they are currently listed for indoor use only, Dixie-Narco recommends an alternate energy consumption test criteria for indoor machines versus outdoor machines. A suggested change to section 4.A. is as follows:

In performing these tests, partner agrees to measure a model's daily energy consumption using ASHRAE Standard 32.1-1997 *Methods of Testing for Rating Bottled and Canned Beverage Machines*. Machines listed for outdoor use must be tested at 90+2 °F (32.2+1 °C); 65+5% relative humidity; and 36+1 °F (2.2+0.5 °C) beverage temperature throughout the test, with all low or no power modes disabled and lighting levels at full illumination. **Machines listed for indoor use only must be tested at 75+2 °F (32.2+1 °C); 45+5% relative humidity; and 36+1 °F (2.2+0.5 °C) beverage temperature throughout the test, with all low or no power modes disabled and lighting levels at full illumination.**

Adding an "indoor" test condition will allow a manufacturer to report an energy consumption value that is more meaningful to the end user as this is typically the average environment in which the product is used. This recommendation is also consistent with the proposed changes to ASHRAE Standard 32.1-1997R, which is currently out for vote with an expected approval prior to 2004.

- With reference to the second note following Section 3.A, on page 6, the specification states that NAMA® has provided the EPA with machine energy consumption data submitted by vending machine manufacturers and that 20% of these machines could meet the Tier II requirements today. While we see Tier II as achievable, it is definitely a challenge and is not a level we have witnessed to-date in the industry. If the specific manufacturers' data were made public, it may help expedite the development and awareness process industry wide.
- Although we recognize the potential issues related to qualifying a re-manufactured machine as ENERGY STAR®, we do not feel it is in the best interest to exclude these products from the scope. While this may be a topic better suited for later discussions, Dixie-Narco would like to consider opportunities to become a "qualified" re-manufacturer under ENERGY STAR® guidelines and would like to keep this issue open for further consideration.

We appreciate the opportunity to participate in the development of this specification and look forward to working with the committee on the successful implementation of this program.

Sincerely,

Kevin A. Poyck  
Dixie-Narco, Inc  
Director, Research and Development